

UNITED STATES DISTRICT COURT OF MASSACHUSETTS

MARIA ALEJANDRA CELIMEN SAVINO,
et al.,

Petitioners-Plaintiffs,

v.

STEVEN SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617-WGY


Declaration of Samantha Solis

I, Samantha Solis, hereby declare under penalty of perjury, that the following is true and correct to the best of my knowledge:

1. My name is Samantha Solis and I am a Case Specialist for BI, Incorporated and work on the Intensive Supervision Appearance Program (ISAP) contract. My primary job functions are to provide case management and supervision services to immigrants enrolled in ISAP. I monitor these individuals with various forms of electronic monitoring that include GPS tracking. The requirements for supervision are dictated by ICE and my case management services are derived by both the needs of the government and the clients I work with.
2. On May 14, 2020, I spoke with participant, Ranferi RAMIREZ-MALDONADO, for the first time. On this date, I advised the subject to report to our office to retrieve a new battery as his unit had stopped communicating.
3. On April 13, 2020, I spoke with Cesar VARGAS VASQUEZ, for the first time.
4. On April 22, 2020, I exchanged an e-mail with Cesar VARGAS VASQUEZ, and included the following message in Spanish. "Hola, Este es el contrato que te toca firmar ya cuando estemos habiernos de Nuevo." Included in this e-mail transmission was an attachment for a GPS Contract that is provided to all clients. The local rules, specific to Boston ISAP, informed that he could not leave the states of New Hampshire, Connecticut, Rhode Island and Massachusetts, without immigration's authorization.

5. All clients under my supervision are advised they cannot leave the states of New Hampshire, Connecticut, Rhode Island and Massachusetts. These geographical boundaries are a standard set upon any individual under the supervision of Boston ISAP, unless otherwise specified.

Date: June 23, 2020



Signature